
**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**MICHAEL LEE, as the
Administrator of the Estate of
RAVEN E. LEE, and ANDERSON
BASTONE, as the Administrator of
the Estate of Chaz Bastone,**

PLAINTIFF,

v.

**GOLF TRANSPORTATION,
INC.;
OCONNOR TRUCKING, INC.;
JP LOGISTICS, INC., UNITED
NATURAL FOODS INC.; UNFI
TRANSPORT, LLC, And
COYOTE LOGISTICS, LLC
DEFENDANTS.**

CIVIL ACTION – LAW

JURY TRIAL DEMANDED

NO.: 3:21-cv-01948

**PLAINTIFF, ANDERSON BASTONE, as the Administrator of the Estate of
CHAZ BASTONE’S, REVISED DISCLOSURES PURSUANT TO Fed. R.
Civ. P. 26(a)(1)**

Plaintiff, ANDERSON BASTONE, as the Administrator of the Estate of
CHAZ BASTONE, by and through his attorneys, Fellerman & Ciarimboli Law,
P.C., serves the following revised disclosures pursuant to Fed.R.Civ.P. 26(a)(1).

- A. Name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claim or defenses, unless solely for impeachment, identifying the subject of the information.

1. **Anderson Bastone, as the Administrator of the Estate of Chaz Bastone, Plaintiff;**
2. **Greg Leksowski – the driver of the vehicle for O’Connor Trucking, Inc.;**
3. **Joseph Orzechowski – witness;**
4. **Representatives of Golf Transportation, Inc., Defendant.;**
5. **Representatives of O’Connor Trucking, Inc., Defendant;**
6. **Representatives of JP Logistics, Inc., Defendant;**
7. **Representatives of United Natural Foods, Inc.;**
8. **Representatives of UNFI Transport, LLC;**
9. **Trooper Michael Thomas - Investigating officer;**
10. **Trooper Jason McKee - Investigating officer;**
11. **Trooper Gilleran - Investigating officer;**
12. **Trooper Gerald Gustas - Investigating officer.**
13. **Maura Deemer**
14. **Herman Bastone**
15. **Judy Bastone**
16. **Anderson Bastone, Jr.**
17. **Casey Bastone**
18. **Myra Bastone**

Plaintiff will provide the identities of additional individuals as discovery proceeds and prior to trial, and therefore reserves the right to supplement.

- B. A copy of, or a description by category and notation of, all documents, data compilations, information and files stored in computerized information management systems, and tangible things that are in possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

1. **Police Crash Report.**

Plaintiff will provide additional records and the identities of additional providers when they become available and to the extent necessary prior to trial, and therefore reserves the right to supplement.

- C. A computation of any category of damages claimed by the disclosing party; making available for inspection or copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on

which computation is based, including materials bearing on the nature and extent of injuries suffered.

At this time, no computation of damages has been made. Plaintiff will provide this information when it becomes available and therefore reserves the right to supplement

D. For inspection or copying as under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or it indemnify or reimburse for payments made to satisfy a judgment.

Defendants' insurance agreements to be supplied to Plaintiff.

E. Disclosure of expert witnesses.

As of the present time, no determination has been made with regard to expert witnesses, if any, who may be called on behalf of Plaintiff at the trial of this action. When this determination has been made, the disclosure will be supplemented and the required information relating to experts will be provided, and therefore, Plaintiff reserves the right to supplement.

FELLERMAN & CIARIMBOLI LAW, P.C.



By: _____

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Date: October 24, 2022